

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

MAY 26 2016

David J. Bradley, Clerk of Court

United States of America

v.

Shuntel COCO (44)
Christopher WILLIAMS (43)
Jesus ESQUIVEL-Ayala (37)

Case No.

H16-809 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2016 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21 USC 846

Conspiracy to possess with intent to distribute approximately 40 kilograms of cocaine.

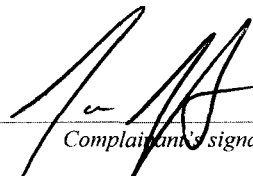
Title 21 USC 841(a)(1)

Possession with intent to distribute approximately 40 kilograms of cocaine.

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

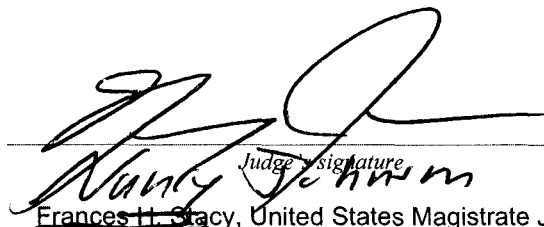
Jason Havemann, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 5-26-16

City and state: Houston TX



Judge's signature

Frances H. Stacy, United States Magistrate Judge

Printed name and title

Affidavit

I, Jason Havemann, your affiant, being duly sworn, depose and state the following:

I am a Special Agent assigned to ~~Homeland Security Investigations (HSI)~~ ^{(DEA) NJ}, Houston, TX. I have been employed as a federal law enforcement officer since August 2008. I have knowledge and experience in various types of investigations to include narcotics and bulk cash smuggling investigations.

The information enumerated in the paragraphs below, furnished in support of this Affidavit, is derived from my own observations, and that of other law enforcement officers.

On May 25, 2016, DEA Agents in San Antonio, Texas, learned through a recorded conversation, which they monitored and overheard, that approximately 40 kilograms of cocaine would be delivered to a person possessing cellular telephone number 832-670-4449. DEA Agents in San Antonio, Texas, passed the information to DEA Agents in Houston, Texas. Having previously acquired a court-authorized location-based GPS search warrant of 832-670-4449, DEA Agents in Houston, Texas, already knew that cellular telephone number 832-670-4449 was utilized by Shuntel COCO. As a result, DEA-Houston Agents believed Shuntel COCO would be involved in the delivery of the cocaine. At approximately 7:25 p.m., DEA Agents observed Shuntel COCO arrive at Christopher WILLIAMS' residence. Shuntel COCO was driving a silver Chevrolet truck. Christopher WILLIAMS and Shuntel COCO spoke outside the residence for several minutes before Shuntel COCO departed.

On May 26, 2016, at approximately 5:15 a.m., DEA Agents and Houston Police Department (HPD) officers established surveillance at Christopher WILLIAMS' residence located at 3206 Ripplebrook Drive, Houston, Texas. Christopher WILLIAMS is a co-worker of Shuntel COCO, and DEA Agents also believe Christopher WILLIAMS to be a criminal associate of Shuntel COCO. Agents and officers simultaneously established surveillance at Shuntel COCO's residence located at 2426 Morning Meadow Drive, Missouri City, Texas. At approximately 5:45 a.m., Christopher WILLIAMS departed his residence and was observed travelling to AAA Storage on McHard Road, Houston, Texas. Christopher WILLIAMS waited in the front parking lot of the business. DEA Agents examined records of AAA Storage, and they indicated that storage unit 19 was leased by Christopher WILLIAMS. At approximately 6:35 a.m., Shuntel was observed departing his residence in the silver Chevrolet truck, and he then travel to the Exxon Gas Station located at 333 FM 521, Fresno, Texas. The Exxon is located approximately 1.2 miles from the AAA Storage on McHard Road.

At approximately 7:40 a.m., Jesus ESQUIVEL-Ayala arrived at the AAA Storage driving a Nissan sedan. At that time, Christopher WILLIAMS drove into the AAA Storage and ESQUIVEL-Ayala followed in the Nissan. Both drove to storage unit 19, where Christopher WILLIAMS unlocked the storage unit and ESQUIVEL-Ayala drove the Nissan into the storage unit. Christopher WILLIAMS positioned his vehicle in a manner which appeared to be in an

attempt to block the view of the interior of the storage unit. Christopher WILLIAMS closed the overhead door to the storage unit with both ESQUIVEL-Ayala and himself inside.

At that time, DEA Agents and HPD Officers approached Christopher WILLIAMS and ESQUIVEL-Ayala as they were exiting the storage unit. Christopher WILLIAMS stated he did not know the person that was inside his storage unit. Christopher WILLIAMS gave written consent to search the storage unit, and 40 bundles of suspected cocaine were discovered in plain view inside the storage unit. ESQUIVEL-Ayala gave written consent to search the Nissan sedan.

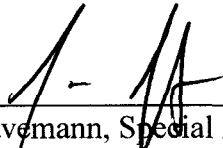
Agents believed Shuntel COCO, the utilizer of cellular telephone number 832-670-4449, to whom the cocaine was being delivered according to the aforementioned May 25th recorded telephone conversation, was overseeing the cocaine delivery from the Exxon Gas Station. Therefore, Shuntel COCO was detained by DEA Agents and HPD officers. Shuntel COCO was in possession of \$2,000 cash, five (5) pills of suspected MDMA (ecstasy), a small amount of marijuana, and numerous pills suspected to be Cialis, without a valid prescription.

Christopher WILLIAMS, Shuntel COCO, and Jesus ESQUIVEL-Ayala were transported to the DEA Houston office. Christopher WILLIAMS waived his rights to have an attorney present during questioning and agreed to answer questions. Christopher WILLIAMS stated that around 7:25 p.m., on the previous day, Shuntel COCO went to his residence and told him about the cocaine delivery at 6 a.m. the following morning. This meeting is corroborated with what DEA agents observed at Christopher WILLIAMS residence on May 25, 2016. Christopher WILLIAMS stated he was to be paid \$2,000 to receive drugs at the storage facility on behalf of Shuntel COCO. The \$2,000 Shuntel COCO possessed when he was encountered at the Exxon gas station is believed to be Christopher WILLIAMS' intended payment. Christopher WILLIAMS stated that he did not know Jesus ESQUIVEL-Ayala, but further indicated he was directed by Shuntel COCO to meet with the driver of the load vehicle to allow the drugs to be delivered to the storage facility. Christopher WILLIAMS further stated that the driver of the load vehicle was the other person arrested with him at the storage facility, that is, Jesus ESQUIVEL-Ayala. Christopher WILLIAMS stated that Jesus ESQUIVEL-Ayala brought the cocaine to the storage facility and unloaded the cocaine inside the storage facility. Christopher WILLIAMS identified the contact "Mudosa" in his cellular telephone as being the person that contacted him leading up to the cocaine delivery, and he then identified the user of that telephone number as Shuntel COCO. A review of Christopher WILLIAMS' text messages revealed that on that morning at approximately 5:12 a.m., Christopher WILLIAMS asked "Mudosa" (Shuntel COCO) "U up," and Shuntel COCO responded, "Yep." Christopher WILLIAMS' telephone call log also reflected that on this morning leading up to the cocaine delivery, he was in telephonic contact with Shuntel COCO a.k.a. "Mudosa" at 5:20 a.m., 5:36 a.m., 5:59 a.m., 6:30 a.m., 6:43 a.m., 7:09 a.m., 7:29 a.m., and 7:39 a.m.

Jesus ESQUIVEL-Ayala was read his Miranda rights in the Spanish language, and he agreed to answer questions. Jesus ESQUIVEL-Ayala said he was not at the storage facility with anyone

else and even denied that he was there with Christopher WILLIAMS. Jesus ESQUIVEL-Ayala also said a friend in Mexico told him to go to the storage facility to pick up a weed-eater. No weed-eater was observed in the storage unit. Jesus ESQUIVEL-Ayala stated that he could not be charged with the cocaine because he was not holding it when Agents arrived on scene.

Shuntel COCO was read his Miranda rights, and he invoked his constitutional right to have counsel present prior to any questioning.



Jason Havemann, Special Agent
U.S. Drug Enforcement Administration

SWORN TO AND SUBSCRIBED BEFORE ME this 26th day of May, 2016.



HON. FRANCES H. STACY *Nancy Johnson*
UNITED STATES MAGISTRATE JUDGE